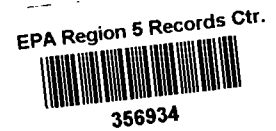




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

HSRL-6J

Monday, 11 July 1994

Tim Tedesco
375 AW/EM
701 Hanger Road
Scott Air Force Base, IL 62225-5035

Re: **Review of the response to comments for the Chemical Data Acquisition Plan and Work Plan for Multi-Site Preliminary Assessment/Site Investigation (hereinafter "the CDAP") for Scott Air Force Base, St. Clair County, Illinois.**

Dear Mr. Tedesco:

The U.S. EPA has received the response to comments and the above referenced document for Scott Air Force Base, St. Clair County, Illinois. Overall, the revised CDAP appears to adequately address the majority of our initial comments. Enclosed with this letter, you will find U.S. EPA comments which were not adequately addressed.

Thank you for the opportunity to provide comments on this document. If you have any questions, please contact me: (312) 886-0850.

Sincerely,

Laura J. Ripley
Federal Facilities Project Manager

Enclosure

cc: Brian Culnan, IEPA.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
COMMENTS**

**Revised Chemical Data Acquisition Plan
and Work Plan for Multi-Site Preliminary Assessment/Site Investigation
for Scott Air Force Base, St. Clair County, Illinois.**

GENERAL COMMENTS

5. The response states that the SOPs have been provided to the USACE. A thorough check of the SOPs should be made in order to insure QA/QC.

SPECIFIC COMMENTS

1. Please explain why Preliminary Assessments (PAs) will be conducted at 12 AOCs [Areas of Concern] and one IRP [Installation Restoration Program] site; however, Site Investigation are planned for only 10 AOCs.
12. Why do three (Bldgs. 433, 1988, 3286) of the referenced twelve oil/water separator sites not represent "much of" or "a significant" threat to the environment? Is there documentation supporting that the levels of constituents of concern did not exceed IEPA cleanup objectives?
13. Please provide the U.S. EPA with a copy of the base storm water sewer system.
24. The CDAP still states that the fill material in the storage yard is a possible source of contamination. Please clarify by providing the origins of the fill material. Was the fill material assessed before its use?
32. U.S. EPA recommends that the grid spacing should be decreased to 5 foot intervals.
36. The statement is made that "...samples to be duplicated will be twice this amount". In actuality, the samples to be duplicated will be triple the amount because it is stated on Page 3-42 "Any time a duplicate sample is collected a split of the sample will be sent to the U.S. ACE Missouri River Division (MRD) Laboratory for QA purposes". *Is it realistic to believe that this much water volume (up to 18l) can be collected from the hydropunch?*
43. Was the mixing area always asphalt covered? Why not install a soil boring through the actual mixing area itself? Would this not be a greater area of concern relative to the proposed soil boring locations?
56. Will the ground water samples collected for metals analysis be filtered or not? The response to comment #33 states that the ground water samples for metals

will not be filtered; while the response to this same comment states that the ground water samples will be filtered prior to metals analysis. Please clarify.

This investigation is a Preliminary Assessment and Site Investigation. In the Site Investigation Objectives (Table 1.1) it is stated that data will be obtained to assess chemical concentrations, to determine if levels exceed action levels and to determine if a threat to human health and the environment still exists. If any of the investigation results are to be used for risk assessment purposes (uses - Table 1.2) or for a potential Decision Document, an appropriate number of background samples should be collected for each media.

- 57. The text states that secondary containment will not be provided for each drum or pallet. Will it be provided for a group of drums or pallets?
- 60. U.S. EPA CLP TAL should be analyzed for rather than the PP metals.
- 64. Typically, the investigators must provide extra volume of samples in order for the laboratory to perform MS/MSD analyses. This is not stated in the CDAP. This information will need to be added in the appropriate section so that the samplers are aware of this. *Is it realistic to believe that this additional water volume can be collected from the hydropunch?*

Additional Comments from the Revised Document:

- 1. ***Page 1-5, Table 1.2, Data Quality Objectives*** - This table infers that the data obtained will be used for risk assessment purposes. Is this considered a *future* use of data?
- 2. ***Page 1-12, Figure 1.4, Surface Water Drainage Map*** - Section 1.5.5, refers to the Runway Drainage Ditch. Where is this ditch located in relation to the figure?
- 3. ***Page 1-19, Section 1.6.4, Waste Water Treatment Plant Sludge Drying Beds*** - The three eastern-most beds were demolished and a new HWSA was constructed in its place. Is there documentation supporting that the levels of constituents of concern did not exceed IEPA cleanup objectives?
- 4. ***Page 1-26, Section 1.6.6, Oil/Water Separators Basewide*** - The text states that three oil/water separator locations are being proposed for further investigation. Will the other oil/water separators be investigated at a future time?
- 5. ***Page 3-4, Section 3.1.4, Hydropunch for Ground Water Sampling and page 3-53, Section 3.5.5, Groundwater Samples from Temporary Monitoring Wells***- The text states that all groundwater samples for metals analysis will be filtered before

placement in the sample bottle. U.S. EPA recommends taking unfiltered samples. See comments #33 and #56.

6. *Page 3-10, 3-16, and 3-23* - On these pages the text states that each ground water sample will require about 4-6 liters; samples to be duplicated will be twice this amount. Actually samples to be duplicated will be three times this amount. See comment responses 36 and 64 above.